I am an avid amateur radio operator and have been closely following the technical issues related to BPL and the licensed services in the frequency range of 2-80 MHz.

BPL has been shown to cause harmful interference in numerous tials. After all, how could it NOT cause interference? The RF signals of BPL are being sent over ANTENNAS (aka power lines). Power lines are not like the coaxial cable used by CTV providers or the balanced twisted pair wire of the phone companies. Power lines act like antennas at RF.

Amatuer radio operators have filed numerous complaints in these test areas to date without any substantive relief. Given the power industries generally poor history on abating noise problems caused by poorly maintained equipment, how can we expect that these same companies will abate harmful interference to licensed operations from BPL?

Regarding the test sites for BPL. The deck is stacked in favor of the BPL industry. Known test sites are using frequencies in the range of 18-29 MHz. Here at the bottom of the solar cycle, and with few stategically places test areas, little interference will be observed at any great distance from the test area or by affected licensed users. BUT, in a few short years propogation will pick up and these signals will be sent around the globe causing a "fog" of RF noise. When combined with a widespread rollout of BPL, this "fog" will make huge chunks of the HF bands unusable.

The rules and enforcement of the BPL *MUST* be as strict as that for cable TV and other licenced services.

1. There need to be performance standards for interference mitigation. This must be available on a 24/7 basis and must take place immediately upon receipt of the complaint.
2. A BPL database must be made available to the public and kept up to date so that interference reports can be immediately sent to the proper place. BPL signals should be able to be identified by licencees who will experience interference. This is already in place for repeaters, broadcasters, etc.
3. There must be an established radiated emission limit to protect mobile services and it must be monitored for compliance and enforced.
4. BPL systems must be tested for compliance PRIOR to operations by an independent laboratory.
5. To ensure an informed marketplace, BPL providers must inform consumers that pursuant to FCC rules, licensed users have priority; hence there can be no guarantee of continuous service. Consumers should have to acknowledge this in writing prior to purchase of service.

I believe that these are the MINIMUM rules that should govern BPL operations.

Please note that other countries including Austria, Australia and Japan have already tabled BPL technology due to its causing interference. Note, not becaues of potential interference, but because of ACTUAL INTERFERENCE. Things will be no different here.

Lastly, given all the problems with widespread BPL rollout, not the least of it being that it is no cheaper than other technologies, one has to ask WHY? Why use it at all? It cannot provide service to people far out in the country, it is fairly slow, the interference is problematic, and the consumers are not clamoring for it.